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there, under the common law idea of the unity of husband and wife, they might be regarded as constituting, in a limited sense, a distinct legal person, so that a life estate in the husband and wife would not merge with a remainder in either one alone. Cf. *Den v. Hardenbergh*, *supra*; *Town of Corinth v. Emery* (1891) 63 Vt. 505, 22 Atl. 618; *Bomar v. Mullins* (1851, S. C.) 4 Rich. Eq. 80.

INTERNATIONAL LAW—ACT OF STATE—ACTS OF MEXICAN REVOLUTIONARY AUTHORITIES BEFORE RECOGNITION.—General Villa, as a military commander of the Constitutionalist Army of Carranza, who later was recognized by the United States as head of the *de facto* and subsequently of the *de jure* government of Mexico, levied a military contribution on the inhabitants of Torreon, Mexico, a city under the military occupation of his forces. M., one of the citizens, an adherent of Huerta, fled the city, and failed to pay the assessment imposed upon him at a meeting of the inhabitants to carry out Villa's levy. To satisfy this assessment, Villa ordered the seizure of a quantity of hides belonging to M., and sold them in Mexico to an American corporation, by whom they were brought to the United States and sold to the defendant. The plaintiff, an American citizen, was the assignee of M., the original owner, and brought suit in replevin to recover the hides. *Held*, that the action could not be maintained. *Oetjen v. Central Leather Co.* (1918) 38 Sup. Ct. 309.

General Pereyra, as a commanding officer of the Constitutionalist Army of Carranza, requisitioned certain lead bullion from the Penoles Mining Co., a Mexican corporation, giving a receipt therefor with promise to pay "on the triumph of the revolution." General Pereyra sold the bullion to the defendant, R., who sold it to the defendant B., the proceeds being used by the General for the supply of his troops. It appears that some months prior to the requisitioning of the bullion, the Mexican corporation had sold it to the plaintiff, an American corporation, which, on the bullion being brought into the United States, enjoined the Collector of Customs from delivering the bullion to any of the defendants, claiming title to be in the plaintiff. *Held*, that a United States Court could not question the defendants' title acquired in Mexico. *Ricaud et al. v. The American Metal Co. Ltd.* (1918) 38 Sup. Ct. 312.

See COMMENTS, p. 812.

INTERNATIONAL LAW—NATIONALITY—STATELESSNESS.—K., an Austrian subject born in 1860, settled in France in 1885, where he married and had children, who were conceded to be French. He had not obtained from the Austrian authorities any permission to expatriate himself, which according to Austrian law was required in the case of Austrians liable to military service. K. offered no evidence of any release from this Austrian military obligation. In 1890 he returned temporarily to Austria, to be baptized. In 1909 he had, as an Austrian subject, applied for French naturalization, which was refused. In the early part of the present war, he rendered some technical service to the French armies. K.'s property having been sequestered in France on the ground that he was an enemy (Austrian) alien, he applied for its release from sequestration on the ground that he had lost his Austrian nationality by reason of his long residence in France without intent to return to Austria. *Held*, that the application should be denied on the ground that it had not been proved that by Austrian law the applicant had lost Austrian nationality, or that he had no intent to return to Austria. *Kornfeld v. The Attorney General*, Tribunal Civil de la Seine (1st Chamber), June 20, 1916, reported in (1917) 44 CLUNET, 638.

The applicant in this case, not having acquired French nationality, sought to show that he was in a position of "statelessness" or *Heimatlos*. This condition arises when one loses his original or acquired nationality without obtaining any other. Two such cases have recently come before the British courts, and like